MINUTES
INFORMATIONAL MEETING
INTERNATIONAL CADMIUM ASSOCIATION
Wednesday, May 17, 2006 – 10:00 AM

King & Spalding – Conference Room F (2nd Floor)
1700 Pennsylvania Avenue, N.W., Washington DC 20006 USA

1. CALL TO ORDER

The meeting was called to order at 10:05 AM by its Chairman, Graham White of Considar Metal Marketing, Inc. The following persons were in attendance:

REPRESENTATIVE	MEMBER COMPANY
Chris Anthinitos	Black & Decker Corporation
Tim Pugh	Black & Decker Corporation
Graham White, Chairman	Considar Metal Marketing, Inc.
Steve Heddle	INMETCO
Al Hardies	INMETCO
Andrew Green	International Zinc Association
David Weinberg	Portable Rechargeable Battery Association

STAFF AND GUESTS	ORGANIZATION
Angela Bednarek	U.S. Department of State
Jane Luxton	King & Spalding
Todd Coy	Kinsbursky Brothers
George Vary	American Zinc Association
Craig Boreiko	International Lead Zinc Research Organization
Lidia Regoli	International Cadmium Association
Hugh Morrow	International Cadmium Association

An attendance roster was circulated for each attendee to sign. The Chairman asked Hugh Morrow to serve as the Secretary Pro-Tempore to record the Minutes of the General Assembly. The Chairman then asked each attendee to introduce himself / herself.

2. REGULATORY AFFAIRS AND MARKET UPDATES

As an informational meeting, this meeting consisted of a series of presentations updating regulatory affairs in Europe, North America, and at the International Level. A short market update was also presented before lunch. After lunch, Angela Bednarek of the U.S. Department of State made a presentation on the U.S. Government's position on some important international issues, most particularly the UNECE Long Range Transboundary Air Pollution Heavy Metals Protocol. Jane Luxton

of King & Spalding made a short presentation on the activities of the North American Metals Council (NAMC) for which she serves as the Secretariat.

Annex I contains the presentation made by Dr. Lidia Regoli with an update of European and International Regulatory Affairs. Annex II presents Hugh Morrow's update on North American and International Regulatory Affairs. Annex III summarizes the latest status of the cadmium market. Annex IV presents the information given by Angela Bednarek of the U.S. Department of State while Annex V is the presentation given by Jane Luxton of King & Spalding and NAMC on the activities of the NAMC.

3. NEXT GENERAL ASSEMBLY OF MEMBERS

The Chairman announced that the next General Assembly of Members of the International Cadmium Association would be held on Thursday, October 12, 2006 from 1:00 PM to 4:30 PM, in London, UK during London Metals Exchange Week.

Respectfully Submitted,	Approved,
Hugh Morrow Secretary, Pro-Tempore	Graham White Chairman

International Chemical Safety Forums
The Regulatory Challenge Viewed from Cadmium

ICdA Information Session
Washington, D.C., USA
17 May 2006

Lidia Regoli

ICdA
International Cadmium Association

Outline

- Environmental Regulation in Europe
- International Chemical Safety Forums
- Emissions Trends
- Emission Sources & Contribution
- Summary

Environmental Regulation on Cd in Europe

EU Cadmium Risk Reduction Strategy – the Belgian Proposal

For ↓ risks to the general population (and the environment) :

- Makes reference to current and developing legislation
  - Fertilisers Directive (with reduction in Cd content)
  - Sewage Sludge Directive
  - IPPC Directive
  - Water Framework Directive

For ↓ risks to workers :

- Makes reference to the comprehensive guidance put forward by industry '*ICdA/Eurométaux risk management of Cd exposure in workers*'
- Suggests an agreement between Industry and the EU Commission on reporting monitoring results

Study on effects of Cd on bone in workers

Cd EU RAR

- Renal effects :

General population – at 2 Cd µg/g creatinine

Workers – at 5 Cd µg/g creatinine

- Bone effects :

General population – at 3 Cd µg/g creatinine

Workers – a level could not be determined

Launch a study on workers exposed to Cd to answer the following :

- At what Cd levels to effects to the bone occur? Below detected effects at the kidney??
- Understand the underlying mechanisms that lead to bone effects

New EU Battery Directive

- Conciliation agreement on May 2nd 2006
- Main outcome for cadmium are:
  - Ban on portable batteries containing Cd.
  - Exemptions are made :
    - emergency systems, medical equipment
    - NiCd batteries in cordless power tools, review four years after entry into force.
    - Industrial and automotive batteries are exempt from ban
- Producers are responsible for the financing collection, treatment & recycling of batteries.
- Recycling efficiency binding target of 75% for NiCds
- Entry into force and transposition – the Directive enters into force on the day it is published in the Official Journal (during the course of 2006)

A few thoughts on REACH - *Authorisation*

- Annex XIII

– is a list of substances requiring authorisation for use

– will contain substances classified as

  - CMR : Carcinogenic, Mutagenic, and Reprotoxic
  - PBT : Persistent, Bioaccumulative, and Toxic
  - and substances of « equivalent concern » (now being defined)

- Prioritisation of substances undergoing authorisation ??
  - Methodology under development (RIP 4.3)

Preparing a dossier for Authorisation

- Industry prepares the dossier for authorisation :
  - Authorised only if no safer substitutes available
  - Authorisation is valid for 5 years. And after???
- Industry's dossier should contain :

Developed « exposure scenarios » for the use of the substance – manufacture, use, end-of-life of the substance

Evaluation of risks for these exposure scenarios

→Cd RAR, NiCd TRAR, Cd RRS

Mandate a substitution plan - including economic, technical impact /feasibility

- Methodology under development (RIP 3.7)

International Chemical Safety Forums

Organisation for Economic Cooperation & Development

NiCd Battery Recycling Program

1990 - Cd nominated as pilot substance in Risk Reduction Program

1994 - OECD Risk Reduction Monograph on Cd Published

1995 - OECD Workshop on Cd, Saltsjobadan, Sweden

1997 - OECD Workshop on Ni-Cd Battery Recycling, Lyon, France

1998 - OECD Workshop on Implementation of Actions to Enhance Ni-Cd Battery Collection and Recycling, Mexico City, Mexico

2000 - OECD Web Site of Recycling Facilities and Programmes
OECD Ni-Cd Battery Recycling Experiences Document
OECD Expert Group on Recycling Rate Data
OECD Ni-Cd Battery Label

Proposed OECD label for NiCd Batteries

Much over-lap on International Programs on Cd

- Transboundary emissions
  - UNEP
  - UNECE
- Product restrictions
  - UNEP
  - UNECE
- Assessing the need for global action (Hg, Pb, Cd)
  - UNEP
  - IFCS

Same information needs/evaluation for UNEP, UNECE, IFCS

United Nations Environment Program
« assessing the need for global action »

- Heavy Metals Program (Hg, Pb, Cd)
- Decision Forum, February 21-25, 2005, Nairobi
  - Governing Council Requests Study on Scientific Information on Cd (and Pb) Transport
  - Opted for Voluntary Partnerships Rather Than Binding Agreements on Hg (Coal-Fired Power, Chlor-Alkali, Gold Mining)
- Review workshop September 2006, Geneva, CH

United Nations Economic Cooperation for Europe
Convention on Long Range Transboundary Air Pollution

- Covers : Pb, Hg and Cd
- 36 countries signed , 24 ratified
- Entry into force in December 2003
- Applies BAT to point sources to reduce emissions
  - Significant reductions noted since 1990
- Task Force on Heavy Metals formed to revise Protocol
  - Revise the need to add other metals & products
  - Proposes Effects-Based, Critical Loads Approach

Intergovernmental Forum on Chemical Safety

« Side event » on heavy metals, Sept 2006 Budapest, H

Purpose

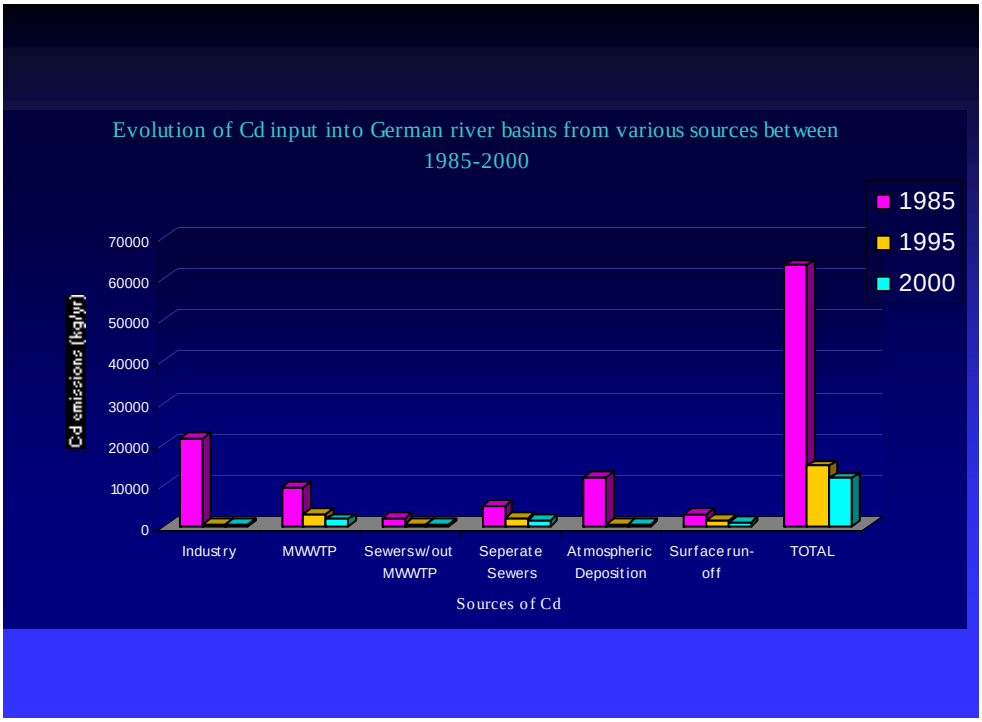
Improve understanding & awareness to negative human and environmental impacts from exposure to Hg, Pb and Cd

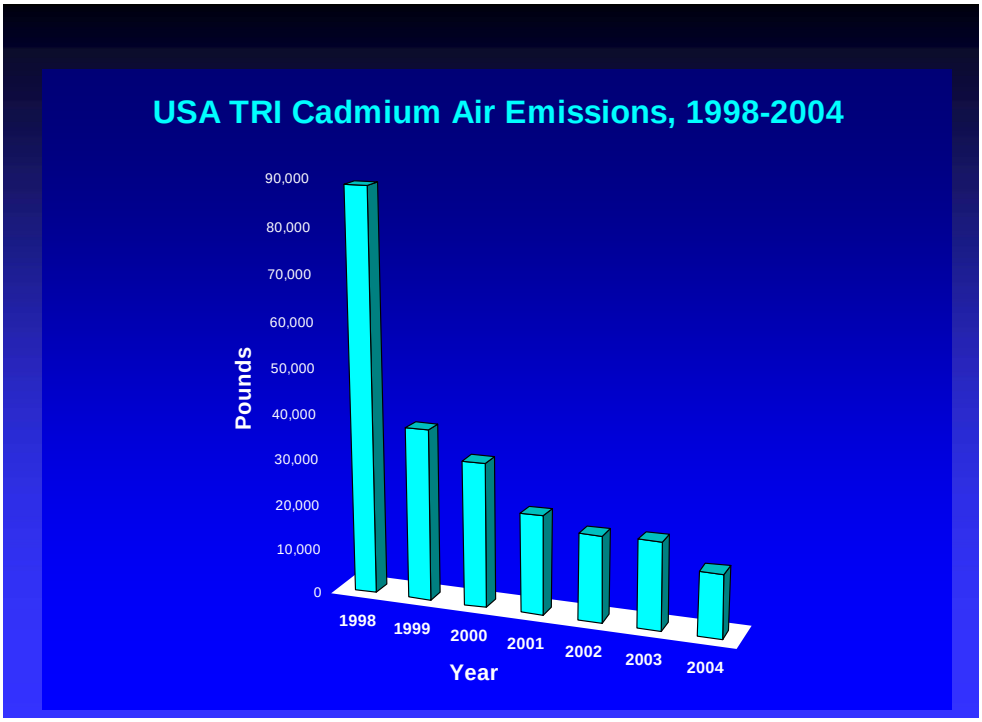
« with the goal to convince policy makers on the urgent need to start global action to reduce harmful metal emissions »

Objectives

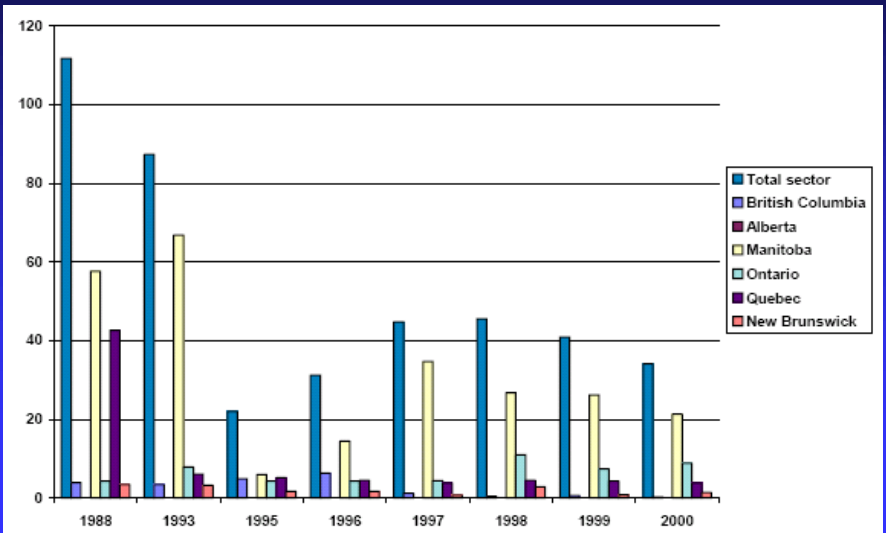
- Present case studies (gold mining, Pb in children, LRTAP)
- Discuss policy responses to challenges posed by Hg, Pb, Cd
- Catalyse discussions on need for global regulatory actions

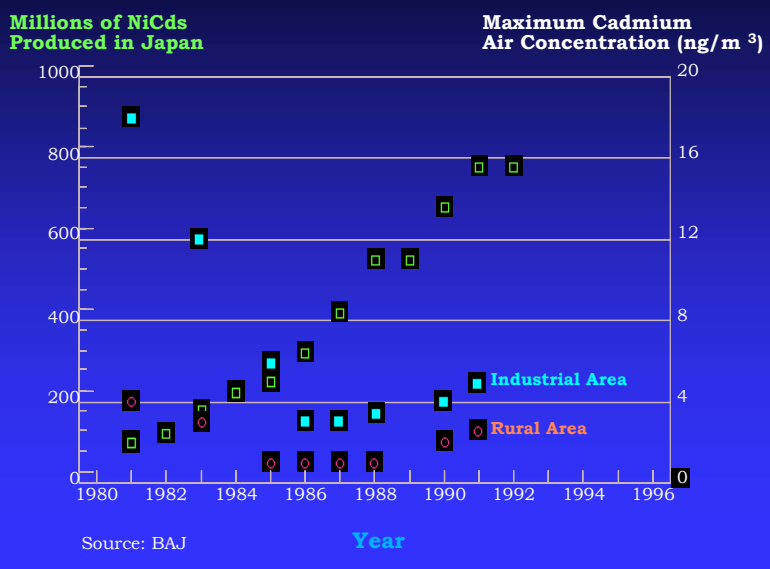
Emission Trends


Evolution of Cd input into German river basins from various sources between 1985-2000
1985
1995
2000
Cd emissions (kg/yr)
70000
60000
50000
40000
30000
20000
10000
0
Industry
MWWTP
Sewers w/out MWWTP
Seperate Sewers
Atmospheric Deposition
Surface run-off
TOTAL
Sources of Cd


USA TRI Cadmium Air Emissions, 1998-2004
Pounds
90,000
80,000
70,000
60,000
50,000
40,000
30,000
20,000
10,000
0
1998
1999
2000
2001
2002
2003
2004
Year

Historical trends in Cd air emissions in Canada (T/yr)
Base Metals Smelting Sector

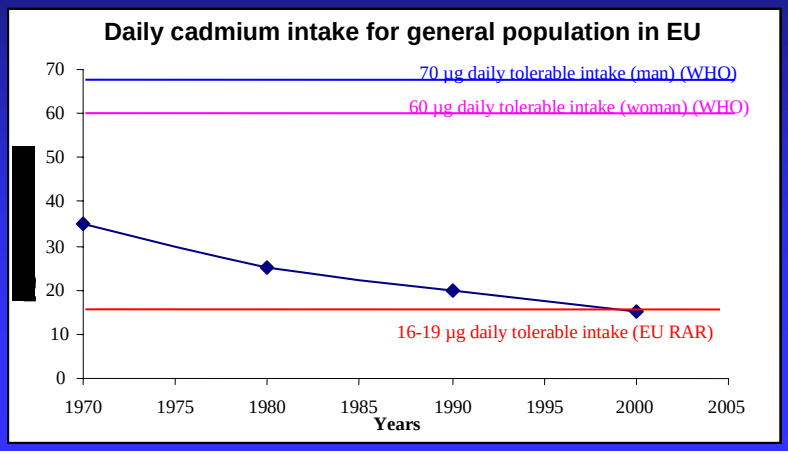




What is the right protection level ?

- Scientific evidence brings us to the PTWI
- EU risk assessment decides on a lower level of protection

A risk can always be found – depends on level of protection you want

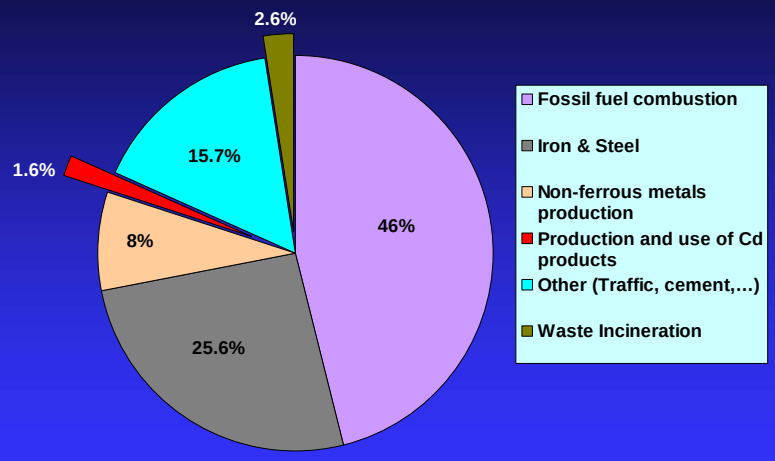


Emission sources and contributions

Sources of Cadmium Emissions

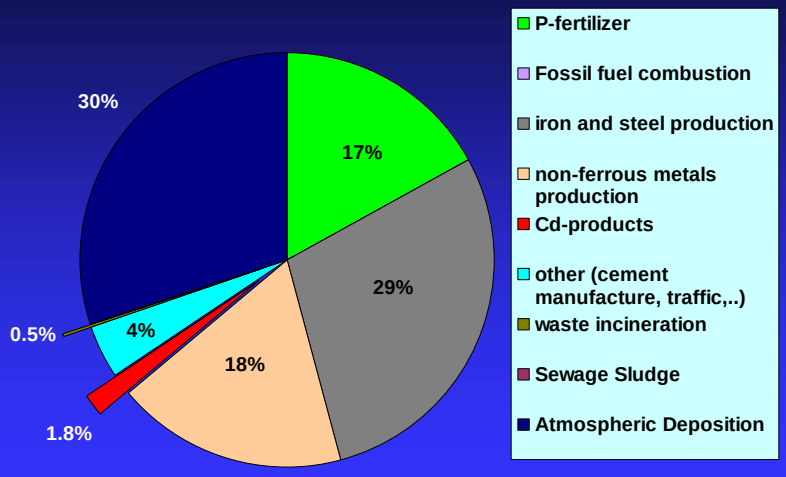
- Natural !
  - Forest fires, volcanoes, soil erosion, sea spray
  - Accounts for 20-50% of emissions (Nriagu 1989/ Richardson 2001)
- Anthropogenic
  - Intentional additions to products
  - Impurities in other materials

Main source of Cd air emissions :
impurities in natural resources; fossil fuel, iron & steel,..



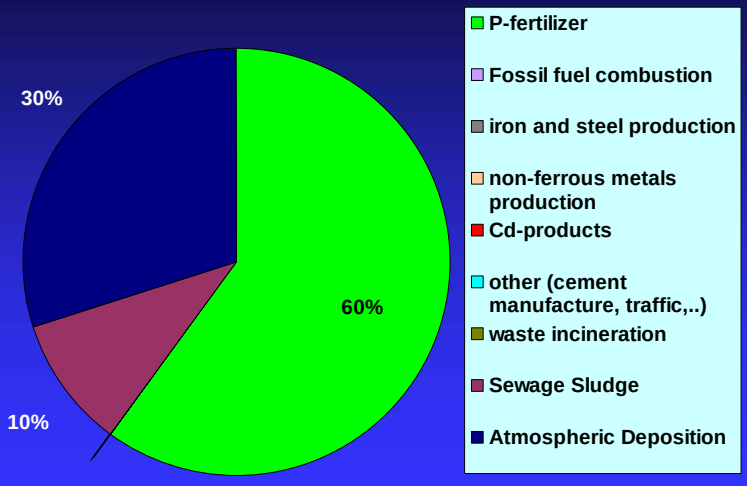
Contribution of anthropogenic Cd to air (EU Cd RAR; (reference year 2002)

Main source of Cd water emissions : impurities in natural resources; fossil fuel, iron & steel,..



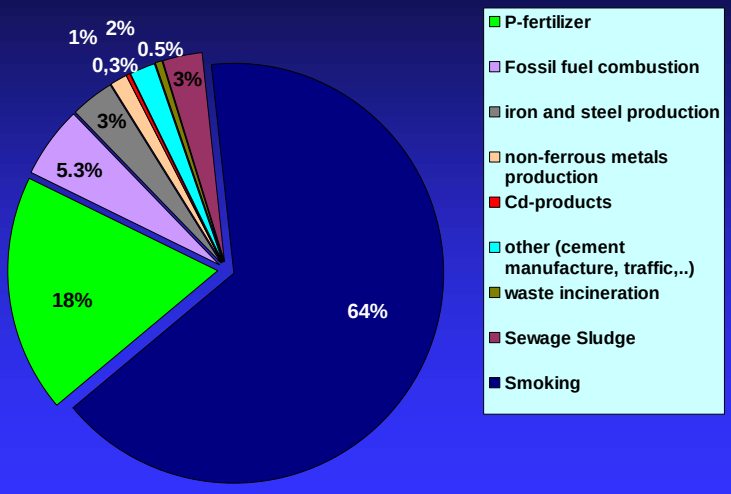
Contribution of anthropogenic Cd to water (EU Cd RAR; (reference year 2002)

Main source of Cd soil emissions : impurities in natural resources; fertilizers, fossil fuels,..



Contribution of anthropogenic Cd to soil (EU Cd RAR; (reference year 2002)

Human Health :
Most Cadmium intake comes from smoking !!



Contribution of anthropogenic Cd the general population (Cd RAR, '05)

Summary

- Cd emissions have reduced drastically in the last 20 yrs
- Cd emissions are stringently controlled by current and upcoming regulation

In the context of International Regulatory Forums

ICdA promotes :

- reduction in emissions at industrial sites using BAT°
- collection and recycling of products (NiCd batteries)
- & provides guidance on managing occupational exposure to Cd

°Best Available Technology

ICdA

International Cadmium Association

Members only website: www.icdamembers.org

Public website: www.cadmium.org

Regulatory Affairs Report North American and International Activities

International Cadmium Association
Informational Meeting

King & Spalding, LLP – 2nd Floor Conference Room
1700 Pennsylvania Avenue, N.W., Washington DC 20006
May 17, 2006

Major North American Cadmium Issues

- U.S. EPA Development of Metals Assessment Framework
- U.S. EPA Toxic Release Inventory (TRI) Lead Rule
- U.S. EPA Integrated Risk Information System (IRIS) Cadmium Assessment
- USA State Programs on Cadmium

US EPA Framework for Inorganic Metals Risk Assessment

- EPA Has Accepted SAB's Comments
- EPA concurs that "use of bioaccumulation factors … are not scientifically supported … for the hazard assessment of metals."
- More EPA Review, Issued Fall 2006
- Human Health PBT Issues Remain

U.S. EPA Toxic Release Inventory (TRI) Lead Rule

- District of Columbia Court Ruled That EPA Was Not Required to Follow Methodology in Establishing Lead TRI Reporting Threshold
- Lower Cadmium Reporting Thresholds Exist in Canada for NPRI (10,000 kg to 50 kg)
- "Human Health PBT" Issue May Also Provide EPA TRI Office Basis on Which to Drastically Lower the Cadmium TRI Reporting Threshold

U.S. EPA Integrated Risk Information System (IRIS)

- EPA Database Contains Scientific Positions on Potential Adverse Human Health Effects
- Oral Reference Doses (RfDs)
  - 0.5 μg/kg/day for water
  - 1.0 μg/kg/day for food
- Inhalation Reference Concentrations (RfCs)
- Carcinogenicity Assessment (Inhalation)
  - Human – Limited
  - Inhalation Unit Risk = 1.8E-3 per $\mu g/m^3$

USA State Programs on Cadmium and Products

- Legislation to Lower Cadmium Product Use
  - San Francisco, Washington, Massachusetts, Minnesota, Great Lakes Bi-National Strategy
- Required Establishment and Financing of Cadmium Product Collection and Recycling
  - California(2003,2004, 2006), WEEE Recycling Proposals in About 20 States
- Emissions, Air Quality Standards
  - California Prop 65 and ChRfD, Oregon

USA State Programs on Cadmium and Products

- Increasing Concern That Many USA State Proposals are Based on EU Directives
- Many Proposals Now Invoke the Precautionary Principle as Their Basis
- Many Proposals Require Phase-Outs, Bans, Restrictions of Cadmium Products
- However, Most Enacted Legislation Still Does Not Actually Ban Cadmium Products

International Cadmium Issues

- UNECE LRTAP Heavy Metals
- UNEP Heavy Metals Program
- Intergovernmental Forum on Chemical Safety (IFCS) Proposed Program on Heavy Metals

UNECE LRTAP
Heavy Metals Protocol

- Entered into Force 29 December 2003
- Applies to Long-Range Transboundary Air Emissions of Pb, Cd & Hg
- Applies BAT to Reduce HM Emissions of Selected Industries from 1990 Base
- Existing Product Restrictions
  - Pb in Gasoline; Hg in Batteries; None Cd
- Task Force on Heavy Metals to Revise

UNECE LRTAP
Task Force on Heavy Metals

- Meeting Held in Ottawa, May 9-12th
- Sufficiency and Effectiveness Review
  - Overview of Heavy Metal Emissions
  - Effects of Deposition of Heavy Metals
  - Modeling and Mapping of Critical Loads
  - Assessments of BATs and ELVs
  - Review of Products and Product Groups
- TFHM Work Plan for 2007

UNECE LRTAP Review of Sufficiency & Effectiveness

- Overview of Emissions
  - Cadmium Air Emissions Decreased by an Average of 51% between 1990 and 2003
  - Sources of Cd Air Emissions Corrected
  - Data Reported on As, Cr, Cu, Ni, Zn, Se
- Effects of Deposition
  - Sweden Insisted on "Soft Waters" Data
  - Sources of Cd Air Emissions Removed

UNECE LRTAP Review of Sufficiency & Effectiveness

- Modeling & Mapping of Critical Loads
  - Very Controversial Technique
  - Accepted by EU, Opposed by USA, Canada
  - Not Scientifically Well Established
- Assessments of BATs and ELVs
  - Most Cd ELVs in Force = 50-200 $\mu g/m^3$
  - ELVs Proposed for BAT on Municipal Waste, Medical Waste and Hazardous Waste Incinerators = 5-50 $\mu g/m^3$

UNECE LRTAP Review of Sufficiency & Effectiveness

- Products and Product Groups
  - Essential Agreement on Text for Mercury Containing Products Except for Dental Amalgams (USA Intervention)
  - Disagreement on Cadmium and Lead Containing Products Not Specifically Mentioned in Annexes VI and VII
  - Opposing Views Presented in Two Annexes (EU vs. USA/Canada/Industry)

UNECE LRTAP Heavy Metals Work Plan for 2007

- Complete Technical Work on the Application of Effects-Based Approach
- Further Develop ELVs and Time Scale for Application of BATs and ELVs
- Prepare Technical Study of Pb, Cd, Hg Source Categories Not Covered in Protocol
- Carry Out Work As Directed by the UNECE LRTAP Working Group on Strategies and Review (WGSR)
- Hold Fourth Meeting in Spring 2007

UNEP Heavy Metals Program

- Information Submitted by a Total of 36 Parties and Organizations
- Draft Scientific Review on Cd to be Prepared for Working Group by July
- Working Group – ICdA, ILZRO, ICMM
- Scientific Reviews to be Finalized by Working Group by September
- Finalize Report for UNEP Governing Council (GC) by October 2006
- Report Considered by GC in February

IFCS Proposed Program on Heavy Metals

- IFCS V To Be Held in Budapest, Hungary, September 24-29, 2006
- Case Studies on Adverse Effects of Heavy Metals in Third World Nations
- "Goal to convince policy makers on the urgent need to start global action"
- Duplicates UNECE, UNEP, SAICM Work
- ICMM / ICdA Will Participate

ANNEX III

Cadmium Market Report

International Cadmium Association
Informational Meeting

King & Spalding, LLP – 2nd Floor Conference Room

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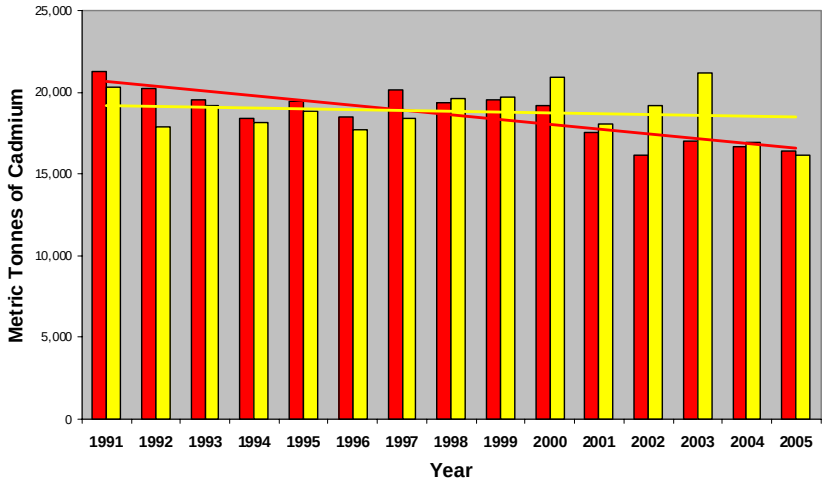
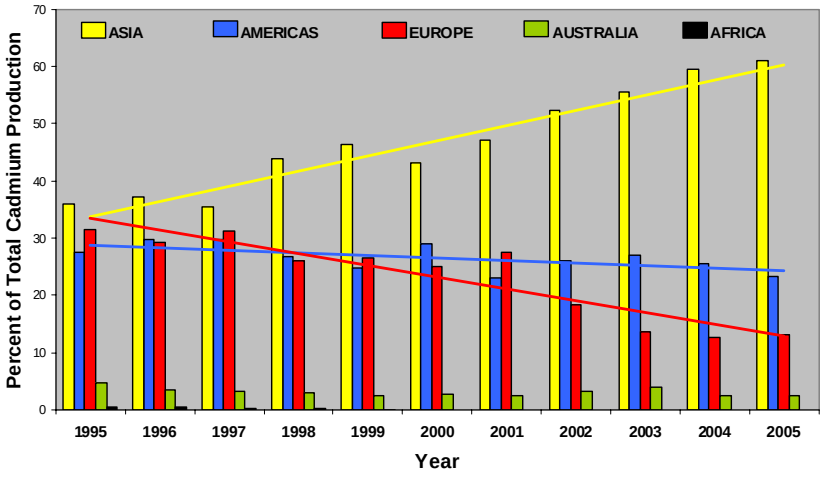
May 17, 2006

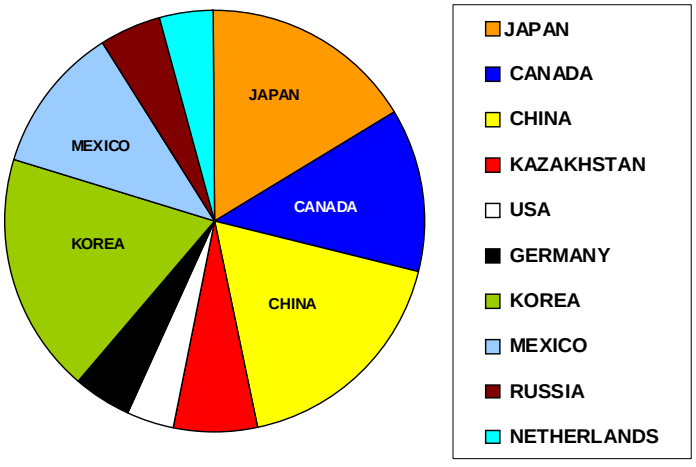
Cadmium Production and Consumption, 1991 - 2005



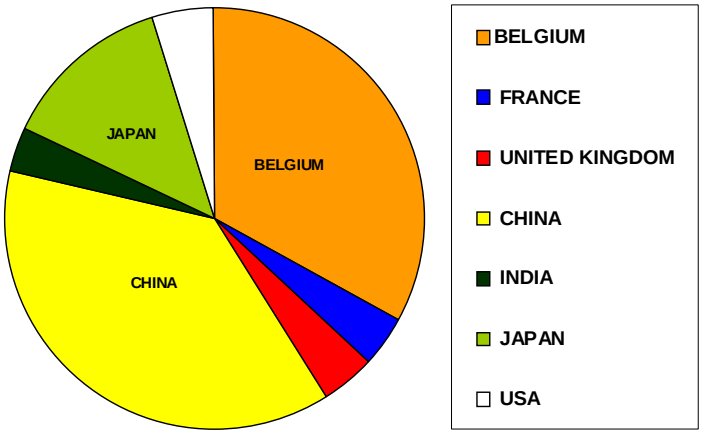
Geographical Trends in Cadmium Production



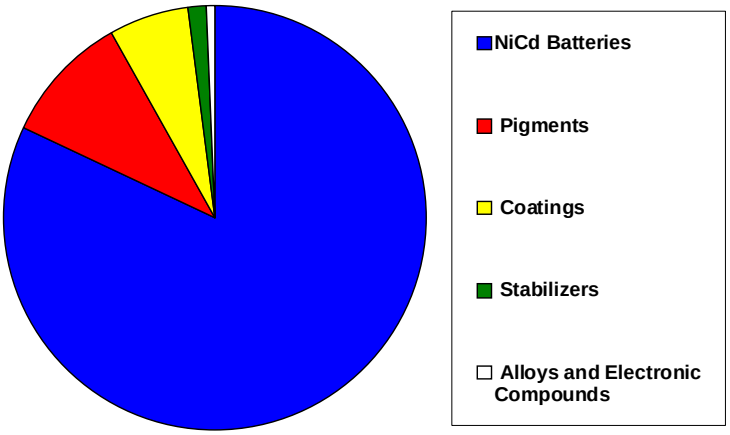
2005 Cadmium Production by Country



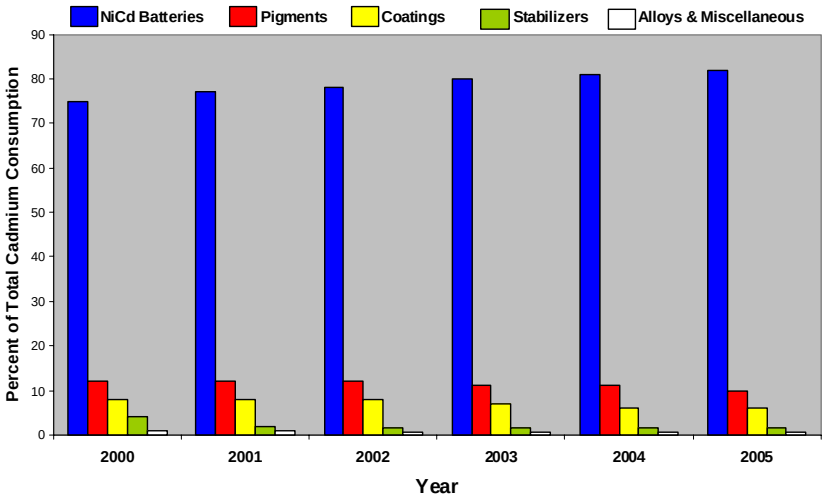
2005 Major Cadmium Consumption by Country



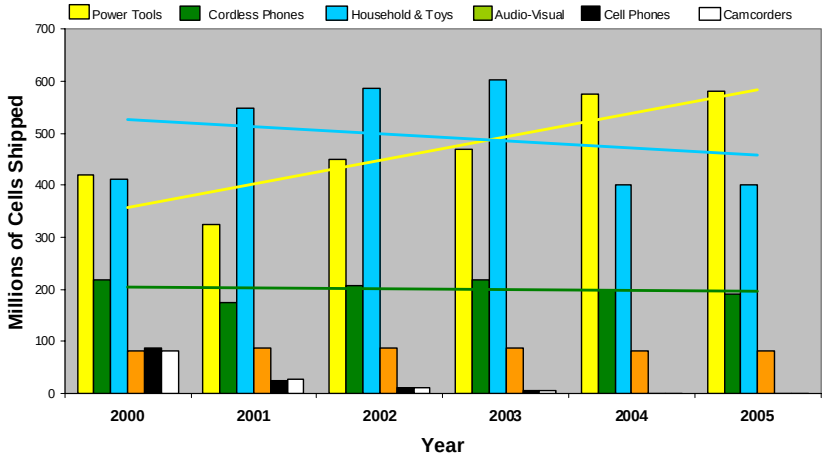
2005 Cadmium Consumption by Applications

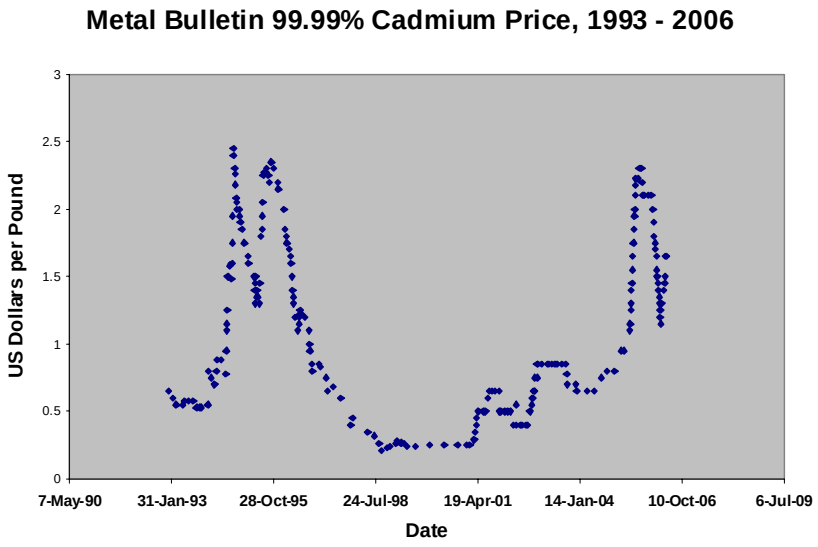


Trends in Cadmium Consumption Patterns



Worldwide Consumer NiCd Shipments (Takeshita - 2003, 2004, 2005, 2006)




Metal Bulletin 99.99% Cadmium Price, 1993 - 2006
US Dollars per Pound
3
2.5
2
1.5
1
0.5
0
7-May-90
31-Jan-93
28-Oct-95
24-Jul-98
19-Apr-01
14-Jan-04
10-Oct-06
6-Jul-09
Date

Cadmium Issues in the Heavy Metals Protocol to the Convention on Long-Range Transboundary Air Pollution (LRTAP)

Angela Bednarek
Office of Environmental Policy
U.S. Department of State

LRTAP Heavy Metals Protocol

- Objective – to control emissions of heavy metals caused by anthropogenic activities that are subject to long-range transboundary atmospheric transport and are likely to have significant adverse effects on human health.

LRTAP Heavy Metals Protocol

- Obligations
  - Reduce total annual emissions from level of emissions in reference year specified.
  - Apply BAT for each new stationary source
  - Apply limit values for new stationary sources or alternative emission reduction strategies.
  - Apply BAT for existing sources (if technically and economically feasible).
  - Apply limit values for existing sources (if technically and economically feasible) or alternative emission reduction strategies.
  - Apply product control measures in accordance with Annex VI (none for Cd).
  - Develop and maintain emission inventories.

LRTAP Heavy Metals Protocol

- Annex II – Stationary Source Categories – Examples:
  - Combustion installations with a net rated thermal input exceeding 50 MW.
  - Municipal waste incineration with a capacity exceeding 3 tons/hour or in accordance with national legislation.

LRTAP Heavy Metals Protocol

- Annex III – Guidance on BAT for stationary source categories.
  - Options
    - E.g., appropriate environmental techniques
  - Control techniques (e.g., fugitive emission control)
  - Sectors
    - Primary and secondary iron and steel industry
    - Primary and secondary non-ferrous metal industry
    - Cement industry
    - Municipal, medical and hazardous waste incineration

LRTAP Heavy Metals Protocol

- Annex IV – Time-scales
  - New stationary sources – two years after the date of entry into force of the Protocol.
  - Existing stationary sources – eight years after the date of entry into force of the Protocol. In some circumstances, this period may be extended.

LRTAP Heavy Metals Protocol

- Annex V – Limit values for controlling emissions from major stationary sources.
  - Values for specific heavy metals or values for emission of particulate matter.
  - Examples: municipal, medical and hazardous waste incineration, combustion of fossil fuels, cement industry.

LRTAP Heavy Metals Protocol

- Annex VI – Product Control Measures.
  - None for cadmium products.

LRTAP Heavy Metals Protocol

- Annex VII – Guidance on Product Management Measures
  - Parties may consider appropriate product management measures where warranted as a result of the potential risk of adverse effects on human health or the environment, taking into account all relevant risks and benefits of such measures, to effect overall reduction of harmful effects.
  - Examples: Economic incentives, recycling, substitution, product labeling.

LRTAP Heavy Metals Protocol

- Issues
  - Sufficiency and Effectiveness Review
  - Effects-based approach.
  - Adding substances, product control measures, or product/product groups to the Protocol.

LRTAP Heavy Metals Protocol

- Issues
  - Sufficiency and Effectiveness Review
    - Deposition
    - Emissions
    - BAT
    - Products and product groups
    - Critical loads
    - Changing economic conditions

LRTAP Heavy Metals Protocol

- Issues
  - Sufficiency and Effectiveness Review
    - Maintaining focus on contributions to air emissions.
    - Maintaining quality reports with accurate technical information and adequate referencing.

LRTAP Heavy Metals Protocol

- Issues
  - Effects-based approach.
    - S&E review: Take into account the extent to which a satisfactory basis exists for the application of an effects-based approach.
    - Alternative ways of regulating.
    - Significant uncertainties and data gaps limit this approach.

LRTAP Heavy Metals Protocol

- Issues
  - Adding substances, product control measures, or product/product groups to the Protocol.
    - Adopted similar procedures to LRTAP POPs Task Force.
    - No proposals yet.

LRTAP Heavy Metals Protocol

- Adding substances, product control measures and product/product groups – Review process:
  - Proposed amendments submitted in writing to Secretariat at least ninety days in advance of Executive Body meeting.
  - Amendments adopted by consensus.
  - Proposing party shall provide information specified in Decision 1998/1.
  - Proposed amendments evaluated in accordance with Decision 1998/1.

LRTAP Heavy Metals Protocol

- Adding substances, product control measures and product/product groups:
  - Review Process
    - Track A – should substance be considered a heavy metal, product measure or product or product group?
    - Track B – Strategy for managing the substance.
    - Ad hoc peer review teams.

LRTAP Heavy Metals Protocol

- Adding substances, product control measures and product/product groups – Review process:
  - Issues
    - Science-based, deliberative review process.
    - Reviews of substances are unbiased and based on accurate, up-to-date information.
    - Consistent interpretation of criteria.
    - Focus on long-range transboundary air pollution.

Activities of the North American Metals Council

International Cadmium Association
Informational Meeting
May 17, 2006

Jane C. Luxton
(202) 626-2627
jluxton@kslaw.com

KING & SPALDING

Background on NAMC

Founded: June 2004

Mission Statement:

NAMC provides leadership and plays an advocacy role on select issues of strategic importance to the metals industry. NAMC's efforts concentrate on multi-metals issues where a cohesive industry voice is beneficial. NAMC works to complement and coordinate rather than duplicate the work of other organizations. NAMC is structured in a way that maintains flexibility and allows for rapid mobilization to address key issues and initiatives as they arise. NAMC's approach is grounded in sound science and is supported by active engagement with the leadership of key national and international organizations (regulatory and non-regulatory).

KING & SPALDING

Background on NAMC (cont'd)

Members:

The Aluminum Association
American Iron & Steel Institute
American Zinc Association
ASARCO LLC
Association of Battery Recyclers
Battery Council International
Copper Development Assoc., Inc.
The Doe Run Company
Edison Electric Institute
Ethyl Corporation
The Fertilizer Institute
IPC, The Assoc. Connecting Elec.
Horsehead Corporation
International Manganese Institute
Kennecott Utah Copper
Mining Association of Canada
National Mining Association (NMA)
Newmont Mining Corporation
Nickel Institute
Non-Ferrous Founders' Society
Noranda Inc./Falconbridge Limited
Phelps Dodge Corporation
Photo Marketing Association Int'l
Rio Tinto
Society of Glass & Ceramic Decorators
Sporting Arms & Ammun. Manf. Inst.
Teck Cominco
Treated Wood Council
Umicore USA Inc.

Website: http://www.namc.org

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Key NAMC Activities

- Metals Framework: formative issue for NAMC
  - December 2000 EPA commitment to develop metals framework
  - Several rounds of comments, EPA issue papers, workshop
  - 2 SAB reviews, most recent completed 1/06
  - EPA Administrator's statement (4/06), recognizing: "bioaccumulation and bioconcentration factors are not scientifically supported for use as generic threshold criteria for the hazard assessment of metals."

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Key NAMC Activities (cont'd)

- Metals Framework: work remaining
  - Completion of Framework - Fall 2006
  - Human health bioaccumulation theory - work underway with EPA (implications for cadmium)
  - TRI Lead Rule: classification of lead as a "PBT chemical" - work underway to correct this conclusion

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Active Engagement with USG as a Voice for North American Metals Sector

- SAICM (in coordination with ICMM)
- REACH (in coordination with ICMM and Eurometaux)
- UNEP
- LRTAP HMP (critical loads, other issues)
- CEC

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Legislative Efforts

- Support for Metals Center (bioavailability issues)
- POPs ratification efforts (TSCA amendments) (in coordination with ACC, other groups)
- Defense Appropriations bill (inadvertent definitional problems)

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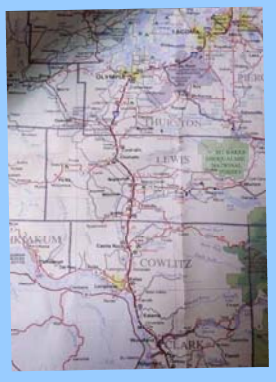
State Initiatives

- Washington State PBT Program
- Florida arsenic modeling



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Issues on the Horizon

- REACH implementation for North American producers and downstream metals users
- GHS - legislation (OSHA) and coordination with REACH
- SMOC
- Canadian DSL, WQ standards
- ?

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